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July 12, 2023

**BY ECF**

The Honorable Analisa Torres  
United States District Court Judge  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

Re: *Chalmers, et al. v. City of New York*, Dkt. No. 20 Civ. 3389 –  
Request for Stay of all Deadlines in Third Civil Case Management Plan

Dear Judge Torres:

I am a Senior Counsel in the New York City Law Department assigned to represent defendant in the above-referenced action. I write on behalf of both parties to respectfully request a stay of all deadlines required by the Amended Third Civil Case Management Plan (“CCMP”) and Scheduling Order in the above-referenced case. *See* Dkt. Nos. 110 and 113.

On March 27, 2023, the Court approved the parties’ Third Proposed CCMP, which built in a short period of time before discovery began to permit the parties to concentrate on mediated settlement discussions. For the same reason, on June 1, 2023, the Court granted a 45-day extension of the deadlines in the Third Proposed CCMP, and during this time, the parties have made substantial progress toward settlement.

On January 10, 2023, May 1 and May 2, 2023, and June 5 and 13, 2023, the parties held in-person mediation sessions with Robin Gise of JAMS for a total of 48.5 hours. In addition, since May of 2023, the parties have held numerous audio and audiovisual mediation sessions with Ms. Gise, recently once or twice a week, and the parties are now within striking distance of reaching a negotiated settlement.

Indeed, the parties have drafted the proposed settlement agreement, notice documents, memorandum of understanding, and proposed order. They also are in the process of marking up these documents and discussing the edits in mediation sessions over audiovisual technology. Ultimately, the parties are striving to reach a negotiated settlement by the beginning of August 2023. Thus, they respectfully request that the Court stay all the deadlines in the Third CCMP, and they thank the Court for its consideration of this request.

District Judge Analisa Torres  
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Respectfully submitted,

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/s

Kami Z. Barker  
*Senior Counsel*

**CC:** Counsel for Plaintiffs in *Chalmers, et al. v. City* and Counsel for all parties in *Local 2507, et al. v. City of New York*, 22-cv-10336 (via ECF)